

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Salem Harbor Power Development LP (f/k/a
Footprint Power Salem Harbor
Development LP), *et al.*¹,

Debtors.

Chapter 11

Case No. 22-10239 (MFW)

(Jointly Administered)

Objection Deadline: May 23, 2022 at 12:00 p.m. (ET)
Hearing Date: May 24, 2022 at 3:00 p.m. (ET)

Related to Docket Nos. 175, 176, 177 and 179

**NOTICE OF HEARING ON MOTION OF IBERDROLA ENERGY PROJECTS INC.
FOR AN ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE,
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004,
AND LOCAL BANKRUPTCY RULE 2004-1 AUTHORIZING
AND DIRECTING THE EXAMINATION OF THE DEBTORS, PREPETITION
OFFICERS, MANAGERS, AND POTENTIAL TRANSFER RECIPIENTS**

PLEASE TAKE NOTICE that on May 16, 2022, Iberdrola Energy Products, Inc. (“IEP”) filed the *Motion of Iberdrola Energy Projects Inc. For an Order Pursuant to Section 105(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients* (Docket No. 175) (the “Motion”) and supporting declaration (Docket No. 176) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that on May 17, 2022, upon motion of IEP, the Bankruptcy Court entered an *Order Granting Motion to Shorten Time for Notice of the Hearing On, and the Deadline to Respond to, Motion of Iberdrola Energy Projects Inc. for an Order Pursuant to Section 105(a) of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2004, and Local Bankruptcy Rule 2004-1 Authorizing and Directing the Examination of the Debtors, Prepetition Officers, Managers, and Potential Transfer Recipients* [Docket No. 179] (the “Order Shortening Notice”).

PLEASE TAKE FURTHER NOTICE that in accordance with the Order Shortening Notice, a hearing with respect to the Motion will be held in the Bankruptcy Court on **May 24, 2022 at**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Salem Harbor Power Development LP (f/k/a Footprint Power Salem Harbor Development LP) (1360); Highstar Salem Harbor Holdings GP, LLC (f/k/a Highstar Footprint Holdings GP, LLC) (2253); Highstar Salem Harbor Power Holdings L.P. (f/k/a Highstar Footprint Power Holdings L.P.) (9509); Salem Harbor Power FinCo GP, LLC (f/k/a Footprint Power Salem Harbor FinCo GP, LLC) (N/A); Salem Harbor Power FinCo, LP (f/k/a Footprint Power Salem Harbor FinCo, LP) (9219); and SH Power DevCo GP LLC (f/k/a Footprint Power SH DevCo GP LLC) (9008). The location of the Debtors’ service address is: c/o Tateswood Energy Company, LLC, 480 Wildwood Forest Drive, Suite 475, Spring, Texas 77380.

3:00 p.m. (prevailing Eastern Time) (the “Hearing”) before the Honorable Mary F. Walrath, United States Bankruptcy Judge, at the Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801. The Hearing will be remote and will be conducted entirely over Zoom and all participants will be required to register in advance.

PLEASE TAKE FURTHER NOTICE that in accordance with the Order Shortening Notice, responses or objections to the Motion, if any, must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801, on or before **May 23, 2022 at 12:00 p.m. (prevailing Eastern Time).**

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THE MOTION IN ACCORDANCE WITH THIS NOTICE AND THE ORDER SHORTENING NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR OPPORTUNITY FOR A HEARING.

Dated: May 17, 2022
Wilmington, Delaware

WHITEFORD, TAYLOR & PRESTON LLC

/s/ Richard W. Riley

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-and-

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